

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION**Los Angeles Regional Water Quality Control Board**

July 3, 2013

Mr. Amin J. Khoury
Chief Executive Officer
B/E Aerospace
1400 Corporate Center Way
Wellington, Florida 33414

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 2970 0000 0645 3205

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2013-0085

SITE: FORMER ALUMINUM DIP BRAZING INDUSTRIES FACILITY, 2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA (FILE NO. 104.0086)

Dear Mr. Khoury:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of the Los Angeles and Ventura Counties, including the referenced site.

The Regional Board is investigating potential sources for groundwater pollution within the United States Environmental Protection Agency (USEPA) San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the former Aluminum Dip Brazing Industries, alias ADB Industries facility, is impacted with volatile organic compounds (VOCs) and heavy metals, particularly chromium.

Regional Board staff has obtained information regarding the former ADB Industries facility located at 2537 North Ontario Street, in the City of Burbank, California (the Site). ADB Industries is a business unit of TSI Group, Incorporated which was acquired by B/E Aerospace in 2010. Regional Board records indicate that ADB Industries occupied the Site between approximately 1972 and 2009. ADB Industries' operations at the Site include machining, welding, sheet metal work, salt bath dip brazing and chromium conversion coating line for aluminum.

Based on our review of available documents, we have determined that additional information is required regarding the operations conducted and the chemicals used and stored by ADB Industries, at the Site. Enclosed is a California Water Code (CWC) section 13267 Order No. R4-2013-0085 (Order), requiring you to complete the enclosed Chemical Storage and Use Questionnaire which provides information regarding the former ADB Industries facility including detailed information regarding site

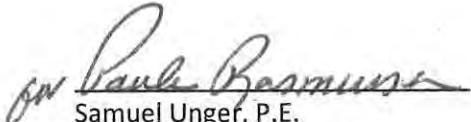
MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

operations and chemical use at the Site, in order to evaluate the potential for soil and groundwater contamination.

Should you have any questions related to this project, please contact Ms. Luz Rabelo via telephone at (213) 576-6783 or via email at luz.rabelo@waterboards.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Samuel Unger", is written over a horizontal line.

Samuel Unger, P.E.
Executive Officer

Enclosure: California Water Code Section 13267 Order No. R4-2013-0085
Chemical Storage and Use Questionnaire

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Milad Taghavi, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster

Los Angeles Regional Water Quality Control Board

**ORDER TO PROVIDE TECHNICAL REPORTS
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2013-0085**

DIRECTED TO B/E AEROSPACE

**FORMER ALUMINUM DIP BRAZING INDUSTRIES FACILITY
2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA
(FILE NO. 104.0086)**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267, which authorizes the Regional Board to require the submittal of technical and monitoring reports.

1. The groundwater within the San Fernando Valley Groundwater Basin (Basin) has been impacted by discharges of heavy metals, specifically chromium. The San Fernando Valley Superfund Site (Superfund Site) lies within the Basin. The United States Environmental Protection Agency (USEPA) and the Regional Board are investigating the potential sources of the discharges to the Basin. The agencies are currently focused on identifying individuals and companies responsible for the discharges of chromium in the Basin and holding them responsible for the investigation and remediation of the source sites. The property located at 2537 North Ontario Street, in the City of Burbank, California (the Site) is a potential source of chromium and overlies the Basin.
2. Aluminum Dip Brazing Industries, alias ADB Industries, formerly operated a facility located at 2537 North Ontario Street, in the City of Burbank, California (the Site). ADB Industries occupied the Site between approximately 1972 and 2009. ADB Industries is a business unit of TSI Group, Incorporated which was acquired by B/E Aerospace in 2010. Regional Board files indicate that on September 5, 2006, Mr. Greg V. Arthur, USEPA Clean Water Act (CWA) Compliance Officer, conducted a CWA Inspection in order to evaluate the compliance status of the former ADB Industries facility. The inspection report stated that ADB Industries' operations at the site included machining, welding, sheet metal work, salt bath dip brazing and chromium conversion coating line for aluminum. Based on our review of available documents, additional information is required in order to evaluate the potential discharge and/or release to the subsurface soils, as a result of ADB Industries' operations, at the Site.
3. CWC section 13267(b)(1) states:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish,

under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

4. The Regional Board suspects that there is or has been a potential for discharge of waste at or from the Site. The supporting evidence is that the former ADB Industries facility is located within the USEPA Superfund Site. It is known that groundwater within the Superfund Site, including the vicinity of the former ADB Industries facility, is contaminated with volatile organic compounds (VOCs) and heavy metals, particularly chromium. The former ADB Industries facility is among the suspected sources of waste discharge in the Superfund Site because of the operations conducted and the suspected chemicals used at the Site.
5. This Order identifies B/E Aerospace as the entity responsible for the potential unauthorized discharge of waste identified in paragraphs two (2) and four (4) because ADB Industries is a business unit of TSI Group, Incorporated which was acquired by B/E Aerospace and ADB Industries' operations at the Site resulted in the potential discharge of waste to the subsurface.
6. This Order requires B/E Aerospace to prepare and submit the enclosed Chemical Storage and Use Questionnaire as well as technical reports on the operations history and chemical use history by the former ADB Industries facility at the Site. You are required to submit a complete report or reports, as required by this Order, to the Regional Board. The Regional Board may request additional information under this Order.
7. The Regional Board needs this information in order to determine whether the Site is a source of discharges of waste, specifically chromium, and to determine whether the subsurface soil conditions at the Site are causing or threatening to cause discharges of waste to the waters of the State within the Basin.
8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to identify sources of discharges of waste to the Basin and to assure adequate cleanup of the former ADB Industries facility, which as described above potentially poses significant threats to public health and the environment.
9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plan are not yet known. It is unlikely that implementation of the work associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.

10. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at the following link:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that B/E Aerospace, pursuant to section 13267(b) of the CWC, is required to submit the following:

By **August 15, 2013**, complete and return the attached Chemical Storage and Use Questionnaire (CUQ) which provides information on past and/or present chemicals stored and used at the former ADB Industries facility located at 2537 North Ontario Street in the City of Burbank, California. Please return the CUQ properly signed, even if no chemicals are stored or used at your facility.

In addition, you must also submit any and all documentation regarding the historical chemical use and storage and detailed information on historical operations conducted at the former ADB Industries facility, including copies of hazardous waste manifests, chemical inventory lists, fire department inspection records and other relevant documents.

The above items shall be submitted to:

Ms. Luz Rabelo
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013
Phone: (213) 576-6783
Email: luz.rabelo@waterboards.ca.gov

Pursuant to section 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required information described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the information is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized B/E Aerospace representative (not by a consultant). The perjury statement shall be in the following format:

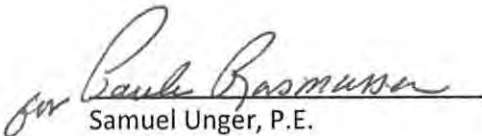
"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittals of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

http://www.waterboards.ca.gov/ust/electronic_submittal

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

7-3-2013
Date

Los Angeles Regional Water Quality Control Board

CHEMICAL STORAGE AND USE QUESTIONNAIRE
HEAVY METALS INVESTIGATION
ALUMINUM DIP BRAZING
2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA

I. Facility information

1. Company name: _____
2. Company address: _____ Unit No. _____
3. Contact Name: _____ Email: _____
4. City: _____ Zip code: _____ Phone: () _____
5. Standard Industrial Classification (SIC): _____
6. Brief description of business:

7. EPA Generator I.D. Number: _____ Years at this location: _____

8. Answer the following questions relative to **present** operations:

- A. Do you perform plating, metal finishing, and anodizing? _____ Yes _____ No
If yes, please explain:

- B. Do you have plating or anodizing tanks? _____ Yes _____ No
- C. Do you use or have you ever used Alumaticote type products? _____ Yes _____ No
- D. Do you have a clarifier, sump, tank or other holding tanks for wastewater? _____ Yes _____ No
- E. Do you have an industrial waste permit for sewer discharge? _____ Yes _____ No
If yes, provide permit no. _____
- F. Do you store chemicals at this location? _____ Yes _____ No

- G. Have any soil, wastewater and/or groundwater investigations been conducted on the property? _____ Yes _____ No

If so, provided date(s), and State or local agency?

9. Do you know if plating operations existed at this location? _____ Yes _____ No
If yes, please explain:

10. Answer the following questions relative to **past** operations, if applicable:

- A. Address of previous metal finishing operations: _____
- B. Years in business at previous location(s), if applicable: _____
- C. Did you once have plating or anodizing tanks? _____ Yes _____ No
- D. Did you perform any metal finishing work? _____ Yes _____ No
- E. Did you have a clarifier, sump, tank or other holding tanks for waste water? _____ Yes _____ No
- F. Did you have an industrial waste permit for sewer discharge? _____ Yes _____ No
- G. Did you have a drum storage area? _____ Yes _____ No
- H. Have any soil, waste water and/or groundwater investigations been conducted on the property? _____ Yes _____ No

If so, provide date(s) and name of regulatory agency: _____

11. Name(s) of former tenants(s), dates of operation and type of business (provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site

12. List all processes in which metallic compounds (Chromium, Cadmium, Mercury, Nickel, Zinc, etc.) are used.

II. Property owner information

1. Name of current property owner: _____
2. Mailing address of property owner: _____
3. City: _____ Zip code: _____ Phone: () _____
4. Prior property owner(s) and the dates of their ownership (for past 40 yrs., if known)

Property Owner	Dates of Ownership	
	From	To

III. Waste Management

1. List source(s) of industrial waste(s) from the site? (Identify sources by process, composition of wastes generated and approximate quantity disposed of monthly).

IV. Sewer Information

1. _____ Industrial _____ Septic tank _____ Municipal _____ Cesspool _____ Other
2. Was a different disposal system used in the past? _____ Yes _____ No
- If yes, specify type _____

V. Chemical Storage and Use

Complete the following sections for each chemical(s) used or stored at the facility, both past and present use; excluding common housekeeping chemicals. Add separate sheets to complete your listing, if necessary.

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____

2. Storage method: _____ Underground tank _____ Drums
 _____ Aboveground tank _____ Other (specify): _____

3. Waste disposal: _____ Sewered _____ Onsite recycling
 _____ Hauled _____ Offsite recycling

4. Is waste treatment preformed prior to disposal? _____ Yes _____ No
If yes, specify treatment method: _____

5. Is waste stored prior to disposal? _____ Yes _____ No

6. Are manifest records for designated waste streams available for review? _____ Yes _____ No

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____

2. Storage method: _____ Underground tank _____ Drums
 _____ Aboveground tank _____ Other (specify): _____

3. Waste disposal: _____ Sewered _____ Onsite recycling
 _____ Hauled _____ Offsite recycling

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If yes, specify treatment method: _____

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4. Is waste treatment preformed prior to disposal? _____ Yes _____ No
 If yes, specify treatment method: _____
5. Is waste stored prior to disposal? _____ Yes _____ No
6. Are manifest records for designated waste streams available for review? _____ Yes _____ No

THIS QUESTIONNAIRE SHALL BE SIGNED AND ACKNOWLEDGE BELOW AS FOLLOWS:

By a principal, an executive of the company, or other authorized representative of the company.
This questionnaire has been completed under penalty of perjury and to the best of my knowledge, as true and correct.

Signature: _____

Date: _____

Printed name: _____

Title: _____

Phone number: () _____

Please Return this Form to:

**LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD
320 WEST 4TH STREET, SUITE 200
LOS ANGELES, CALIFORNIA 90013**